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August 27, 2024

Application **GRANTED in part**. The initial pretrial conference scheduled for September 4, 2024, is adjourned to **October 2, 2024, at 4:10 P.M.** The parties shall file a joint letter and proposed case management plan by **September 25, 2024**.

VIA ECF

Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *Spedition "Thomas" Esellschaft MBH v. Maersk A/S*
Case No. 1:24-cv-05286-LGS

Dear Judge Schofield:

We represent the plaintiff in the above referenced action. We write jointly with counsel for defendant Maersk A/S ("Maersk") to respectfully request a 60-day adjournment of the initial scheduling conference currently scheduled for September 4, 2024 at 4:10 p.m.

Maersk executed a waiver of service on August 27, 2024 and its answer is due 60 days from that date (by October 26, 2024). Therefore, additional time is needed for Maersk to answer and appear in this action prior to the initial conference. This is the first request for an adjournment of the initial scheduling conference in this matter.

We thank the Court for its time and consideration of this matter. Please do not hesitate to contact the undersigned with any questions or comments.

Respectfully submitted,

NICOLETTI HORNIG & SWEENEY



By:

Val Wamser

CC:

All Counsel of Record via ECF